IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

CANDIDA STOKES,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	**Civil Action No.**
THE CITY OF MONTGOMERY,	)	**2:07-cv-686**
ARTHUR BAYLOR, Chief of Police,	)	
BOBBY BRIGHT, Mayor, in	)	
their individual	)	
and official capacities,	)	
	)	
Defendant.	)	

JOINT MOTION FOR EXTENSION OF DEADLINES FOR DISPOSITIVE MOTIONS

COME NOW, the parties, by and through their attorneys, and respectfully move this Court to extend the deadline for the parties to file dispositive motions in this matter. As grounds for this Motion, the parties state as follows:

1. Under the current Scheduling Order, dispositive motions are due July 18, 2008.

2. The parties have scheduled mediation for July 29, 2008.

3. The parties request that the dispositive motion deadlines be moved in order to facilitate settlement. The amount of time and resources required to file dispositive motions will cause attorney fees to rapidly increase, making settlement of this matter more difficult.

4. The parties respectfully move this Court to extend the deadline to submit dispositive motions as follows: Dispositive Motions due August 12, 2008; Responses due August 26, 2008; and Replies due September 2, 2008.

5. No party will be prejudiced by the granting of this Motion.

6. Both parties have been actively seeking discovery while continuing to pursue settlement and both parties agree that mediation is in good faith by both sides and should lead to resolution of this matter.

7. This extension will not affect any other deadlines.

WHEREFORE, the parties respectfully move this Honorable Court to grant this Motion and extend the deadlines for the submission of dispositive motions as requested herein.

Dated : July 3, 2008.

/s/Michael Boyle
Attorney for Defendants

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